

EXHIBIT E

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January 14, 2015

BY EMAIL

Nick G. Saros, Esq.
Jenner & Block LLP
633 West 5th Street
Suite 3600
Los Angeles, CA 90071

Re: Epic Systems Corp. v. Tata Consultancy Services Limited *et al.*,
14-cv-748 (W.D. Wisconsin)

Dear Nick:

As mentioned during our Rule 26(f) conference, and previewed in TCS's sections of the Rule 26(f) Report, we believe that the most efficient means to quickly locate documents potentially responsive to Epic's December 23, 2014 document requests is to search for them electronically. TCS proposes that this search cover the reasonably available emails of the following custodians:

Philippe Guoinnet
Ramesh Gajaram
Aswin Kumar Anandhan
Shankari Gunasekaran
Vijaya Saradhi Badipatla
Dr. MVK Sarma

The proposed time period for the search is June 1, 2012 through the date of the Complaint, October 31, 2014. We propose to use the search terms set forth on Exhibit A hereto. However, TCS reserves the right to limit or revise any of these search terms, in consultation with Epic, should any of them result in a large number of false positive results.

We believe that this combination of custodians and search terms will lead to the discovery of any documents pertinent to a potential preliminary injunction motion by Epic.

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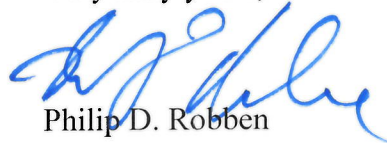
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Messrs. Guoinnet, Gajaram, Anandhan, and Gunasekaran are the TCS employees around which Epic's allegations revolve. Mr. Badipatla and Dr. Sarma are TCS employees that work on the development of Med Mantra. We have selected them because we believe that Epic information, if any, made use of in connection with the development of Med Mantra would have necessarily passed to these individuals in their respective roles as project manager for Med Mantra.

As indicated in the Rule 26(f) Report, assuming that the parties agree on the search terms and scope of this search, TCS will finish collecting, review, and produce responsive, non-privileged documents yielded by the search outlined above on a rolling basis, starting on or before January 30, 2015. TCS cannot know the amount of documents that will need to be reviewed until the parties have agreed on search parameters. Nevertheless, TCS will use its best efforts to complete its production by February 13, 2015.

While we believe it is premature to schedule deposition dates for Messrs. Gajaram, Anandhan, and Gunasekaram at this time, we will discuss your request with our client and we reiterate our position that these depositions should take place after TCS completes its initial document production.

Very truly yours,



Philip D. Robben

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Nick G. Saros, Esq.
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Exhibit A

For all custodians:

- UserWeb
- Search each of the 502 unique “package names” listed in EPIC0000002.

For custodians related to Kaiser:

- “Med Mantra”
- Epic AND (download! OR document! OR confidential OR “source code”)
- [TCS email addresses of Med Mantra team members]

For custodians related to Med Mantra:

- Epic
- Kaiser
- @kp.org
- [TCS email addresses of Kaiser team custodians]